

LAW OFFICES OF DALE K. GALIPO

Dale K. Galipo, Esq. (Bar No. 144074)
dalekgalipo@yahoo.com
Hang D. Le, Esq. (Bar No. 293450)
hlee@galipolaw.com
21800 Burbank Boulevard, Suite 310
Woodland Hills, California, 91367
Telephone: (818) 347-3333
Facsimile: (818) 347-4118

LAW OFFICE OF STEWART KATZ

Stewart Katz, State Bar #127425
555 University Avenue, Suite 270
Sacramento, California 95825
Telephone: (916) 444-5678

Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

VERONICA MCLEOD, individually and as
successor in interest to decedent, DOLORES
HERNANDEZ; AMADO HERNANDEZ,
individually and as successor in interest to
decedent, DOLORES HERNANDEZ; and
YSIDRA REGALDO, individually,

Plaintiffs,

vs.

CITY OF REDDING; GARRETT
MAXWELL, an individual; MATTHEW
BRUCE, an individual; and DOES 2-10,
inclusive,

Defendants.

Case No. 2:22-cv-00585-WBS-JDP

Honorable William B. Shubb

**PLAINTIFFS' PROPOSED VERDICT
FORM (DAMAGES)**

Trial: September 10, 2024

**TO THE HONORABLE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF
RECORD:**

Plaintiffs VERONICA MCLEOD, individually and as successor in interest to decedent,
DOLORES HERNANDEZ and AMADO HERNANDEZ, individually and as successor in interest
to decedent, DOLORES HERNANDEZ (“Plaintiffs”) hereby submit their Proposed Verdict Form
(Damages) pursuant to the Court’s July 3, 2024, Final Pretrial Order.

Respectfully submitted,

DATED: August 20, 2024

**LAW OFFICES OF DALE K. GALIPO
LAW OFFICE OF STEWART KATZ**

By /s/ Hang D. Le

Dale K. Galipo

Stewart Katz

Hang D. Le

Attorneys for Plaintiffs

VERONICA MCLEOD, AMADO HERNANDEZ,
and YSIDRA REGALDO

QUESTION 1: What are Dolores Hernandez's damages?

Pre-death pain and suffering;
emotional distress

\$ _____

Loss of life

\$_____

QUESTION 2: What are the Plaintiffs' wrongful death damages for the loss of Dolores

Hernandez?

Plaintiff Veronica McLeod

Past loss of Dolores Hernandez's probable support, companionship, society, comfort, and consortium

\$_____

Future loss of Dolores Hernandez's probable support, companionship, society, comfort, and consortium

\$_____

Plaintiff Amado Hernandez

Past loss of Dolores Hernandez's probable support, companionship, society, comfort, and consortium

\$_____

Future loss of Dolores Hernandez's probable support, companionship, society, comfort, and consortium

\$_____

QUESTION 3: What amount of punitive damages, if any, do you award?

Veronica McLeod

\$ _____

Amado Hernandez

\$_____

1 *Please sign and date this verdict form and return it to the Court.*

2 Dated: _____ Signed: _____

3 Jury Foreperson

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28